# Commonwealth of Kentucky

**Natural Resources and Environmental Protection Cabinet**
**Department for Environmental Protection**
**Division for Air Quality**
**803 Schenkel Lane**
**Frankfort, Kentucky 40601**
**(502) 573-3382**

## Title V
## AIR QUALITY PERMIT
**Issued under 401 KAR 52:020**

| | |
|---|---|
| **Permittee Name:** | **Texwood Industries, Inc.** |
| **Mailing Address:** | **515 Big Stone Gap, Duncanville, Texas, 75137** |
| **Source Name:** | **Same** |
| **Mailing Address:** | **Same** |
| **Source Location:** | **51 Clarence Drive, Mt. Sterling, KY 40353** |
| **Permit Number:** | **V-04-003** |
| **Log Number:** | **50726 (F931)** |
| **Review Type:** | **Operating, Title V, Synthetic Minor** |
| **Source ID #:** | **21-173-00025** |
| **Regional Office** | **Ashland**<br>**3700 13th Street**<br>**Ashland, KY 41105-1507**<br>**(606) 920-2067** |
| **County:** | **Montgomery** |
| **Application Complete Date:** | **December 6, 2003** |
| **Issuance Date:** | |
| **Expiration Date:** | |

**John S. Lyons, Director**
**Division for Air Quality**

*Revised 12/09/02*

## SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.
The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

# SECTION B - AFFECTED FACILLITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

**06, 07, 08, 12 (1A, 2B, 2C, 3A, 4A) Spray Booths not controlled by RTO**

| | |
|---|---|
| EP# 06 | 1A Prestain Booth |
| EP# 07 | 2B Staining Booth |
| EP# 08 | 2C Sealing Booth |
| EP# 12 | 3A 4A Parts Booths |
| | 2D Topcoat Booth |

**Description:** Spray booths for coating cabinets and cabinet parts
Particulate controlled by disposable filters
All equipment installed August 1994

**APPLICABLE REGULATIONS:**
401 KAR 59:010, New process operations
40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations

**1. Operating Limitations:**
See Subpart JJ Requirements

**2. Emission Limitations:**
A. Visible emissions shall not equal or exceed 20 % opacity. (401 KAR 59:010, Sect. 3)
B. Particulate emissions shall not exceed 2.34 lbs/hr per booth.(401 KAR 59:010, Sect. 3)
**Compliance Demonstration Method:** Demonstrate that all particulate filters are in place and pressure drop across each filter does not exceed 1.5 in.w.c.. When filters are in place and functional, compliance with A. & B. is assumed.
C. See Subpart JJ requirements.
D. See Section D for sourcewide limits.

**3. Testing Requirements:** Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Specific Monitoring Requirements:**
A. Pressure drop at each booth shall be monitored as an indicator of particulate filter condition.
B. See Subpart JJ Requirements.

**5. Specific Recordkeeping Requirements:** See Subpart JJ Requirements and Section D

**6. Specific Reporting Requirements:** See Subpart JJ Requirements and Section D

**7. Specific Control Equipment Operating Conditions:**
A. Each spray booth shall have a functioning gauge to measure pressure drop across the particulate filter.
B. The pressure drop shall not exceed 1.5 in.w.c..

## SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**13** 2A Prestain Booth **Spray Booths controlled by the RTO**
1B Staining Booth
1C Sealing Booth
1D Topcoat Booth

**Description:** Spray booths for coating cabinets and cabinet parts
Particulate controlled by disposable filters
All equipment installed August 1994
VOC's controlled by Tellkamp regenerative thermal oxidizer (RTO), installed March 2003

**APPLICABLE REGULATIONS:**
401 KAR 59:010, New process operations
40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations

**1. Operating Limitations:**
See Subpart JJ Requirements

**2. Emission Limitations:**

A. Visible emissions shall not equal or exceed 20 % opacity. (401 KAR 59:010, Sect. 3)
B. Particulate emissions shall not exceed 2.34 lbs/hr per booth (401 KAR 59:010, Sect.3)
**Compliance Demonstration Method:** Demonstrate that all particulate filters are in place and pressure drop across each filter does not exceed 1.5 in. w.c.. When filters are in place and functional, compliance with A. & B. is assumed.
C. See Subpart JJ requirements
D. See Section D for synthetic minor limits.

**3. Testing Requirements:** Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Specific Monitoring Requirements:**

A. Pressure drop at each booth shall be monitored as an indicator of particulate filter condition.
B. See Subpart JJ Requirements.
C. See Section E for oxidizer monitoring requirements.

## SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**5. Specific Recordkeeping Requirements:**

See Subpart JJ Requirements and Sections D and E.

**6. Specific Reporting Requirements:**

See Subpart JJ Requirements and Sections D and E.

**7. Specific Control Equipment Operating Conditions:**

A. Each spray booth shall have a functioning guage to measure pressure drop across the particulate filter.

B. Filters must be in place and operational according to manufacturer's specifications and recommendations. Pressure drop across the filter shall not exceed 1.5 in. w.c..

C. See Section E.

**8. Alternate Operating Scenarios: This applies only in the event that the RTO has been rendered inoperable by disconnection and capping of the fuel supply and ductwork.**

**Requirements of Section E shall not apply.**

## SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## Subpart JJ Requirements:

### 1. Operating Limitations:

A. 40 CFR 63.803(b), **OPERATOR TRAINING:** Personnel involved in finishing, gluing, cleaning, and washoff operations shall be trained in appropriate application, cleaning, and washoff procedures, equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes. New personnel shall be trained upon hiring. All personnel shall be given refresher training annually.

B. 40 CFR 63.803(d), **WASHOFF AND CLEANING SOLVENTS:** Cleaning or washoff solvents that contain any of the pollutants listed in 40CFR 63, Subpart JJ, Table 4, in concentrations subject to MSDS reporting as required by OSHA, shall not be used. Emissions from washoff shall be further controlled by using normally closed tanks to contain washoff, and orientation of the part to drain as much solvent as possible.

C. 40 CFR 63.803(f), **SPRAY BOOTH CLEANING:** Compounds containing more than 8.0 percent VOC's by weight of shall not be used for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, (the spray booth coating or other protective material used to cover the booth is being replaced) the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.

D. 40 CFR 63.802(b)(3), **STRIPPABLE SPRAY BOOTH COATINGS:** Shall contain no more than 0.8 lb VOC per lb solids as applied.

E. 40 CFR 63.803(i), **LINE AND GUN CLEANING:** Normally closed containers shall be used to contain all organic solvent used to clean lines and spray guns.

F. 40 CFR 63.803(g), **STORAGE REQUIREMENTS:** Normally closed containers shall be used for storing finishing, gluing, cleaning, and washoff materials.

G. 40 CFR 63.803(h), **APPLICATION EQUIPMENT REQUIREMENTS:** Conventional air spray guns shall be used to apply finishing materials only under any of the following circumstances:

1. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

## SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. For touchup and repair under the following conditions:
   (a) The touchup and repair occurs after completion of the finishing operation; or
   (b) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material and the material used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

3. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period.

H. 40 CFR 63.803(c), **LEAK INSPECTION REQUIREMENTS:** As a minimum, all equipment used to transfer or apply coatings, adhesives, or organic solvents shall be visually inspected once per month. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected, and final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

I. 40 CFR 63.802(b)(2), **ADHESIVES:** Volatile Hazardous Air Pollutant (VHAP) content of contact adhesives applied to porous substrates shall not exceed 0.2 lb VHAP/ lb. solids as applied.

**2. Emission Limitations:**

A. 40 CFR 63.802(b), **EMISSION LIMITS FOR FINISH MATERIALS:** Volatile Hazardous Air Pollutant (VHAP) emissions shall not exceed 1.0 lb VHAP/ lb solids.

**Compliance Demonstration Method for Uncontrolled Facilities:**

The permittee shall calculate the average VHAP emitted for all finishing materials used in facilities having no external control device using the following equation, and maintain a value of E no greator than 1.0 lbs VHAP/ lbs solids:

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + ***** + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + ***** + S_nW_n) / (M_{c1} + M_{c2} + ***** + M_n)$$

E = the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.

$M_c$ = the mass of solids in finishing material c, used monthly, lb solids/months.

$C_c$ = the VHAP content of a finishing material c, in pounds of VHAP per pounds of coating solids.

S = the VHAP content of a solvent, expressed as weight fraction, added to finishing materials.

W = the amount of solvent in pounds, added to finishing materials during the monthly averaging period.

## SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**Compliance Demonstration Method for Controlled Facilities:**
The tested destruction efficiency of the thermal oxidizer is 98%.
Capture efficiency for each controlled booth is:
2A Prestain (Sap)- 99.7%
2A Prestain (Toner) – 93.4%
2A Prestain (NGR) – 99.6%
2A Prestain (White Primer) – 90.0%
1B Stain (NGR) – 99.0%
1B Stain (Sap) – 99.7%
1C Sealer (WW Topcoat) – 75.9
1D Topcoat (WW Topcoat) – 80.7

R = (Capture efficiency for the material being used)( Destruction efficiency)
Using the equation, $R = \{( E_{bc} – E_{ac} )/ E_{bc} \}(100)$, R must be sufficient such that the value of $E_{ac}$ is no greater than 1.0.
$E_{bc}$ shall be calculated using the equation for calculating E for uncontrolled facilities.

R = Control Efficiency
$E_{bc}$ = Emissions before control (lb VHAP/lb solids)
$E_{ac}$ = Emissions after control (lb VHAP/lb solids)
Compliance may also be demonstrated by using only compliant materials or by an averaging approach using any combination of methods.

B. See Section D for additional emission limitations.

**3.** **Testing Requirements:** Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4.** **Monitoring Requirements:** See Section F

**5.** **Specific Record Keeping Requirements:**

A. **FOR THE OPERATOR TRAINING PROGRAM:**

(1) A list of all current personnel by name and job description that are required to be trained;
(2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
(3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
(4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

## SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

B. **LEAK INSPECTION AND MAINTENANCE PLAN** that specifies:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
(2) An inspection schedule;
(3) Methods for documenting the date and results of each inspection and any repairs that were made;
(4) The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
  (a) First attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
  (b) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

C. **CLEANING AND WASHOFF SOLVENT ACCOUNTING SYSTEM** to include**:**

(1) The quantity and type of organic solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801.
(2) The number of pieces washed off, and the reason for the washoff.
(3) The quantity of spent solvent generated from each washoff and cleaning operation

D. **COMPLIANCE REPORT:** The permittee shall maintain records demonstrating that the coatings and thinners are compliant according to Table 3 of 40CFR 63 Subpart JJ. These records shall include:
(1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Table 3;
(2) The VHAP content (A list of VHAP can be found in Table 2 of Subpart JJ), in lb VHAP/ lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Table 3; and
(3) The VOC content, in lb VHAP/ lb solids, as applied, of each strippable booth coating subject to the emission limits in Table 3.

E. **FORMULATION ASSESSMENT PLAN:** The owner/operator shall prepare and maintain a record which:
(1) Identifies VHAP from the list in Table 5 of 40 CFR 63 Subpart JJ, that are being used in finishing operations by the affected source;
(2) If no VHAP from Table 5 of 40 CFR 63 Subpart JJ is used then the record shall reflect that; otherwise

## SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(3) The owner/operator should follow guidelines for the formulation assessment plan as presented in 40 CFR 63.803 (l), Formulation assessment plan for finishing operations;
(4) If after November 1998, an affected source uses a Volatile Hazardous Air Pollutant (VHAP) of potential concern as listed in Table 6 of 40 CFR 63 Subpart JJ, and exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of 40 CFR 63.803, the affected source shall follow the procedures established in paragraph (l)(5).

**6.** **Specific Reporting Requirements:** 40 CFR 63.807

**Within 30 calendar days after the end of the first six month period of operation, and each six months thereafter (this timing should be adjusted to coincide with semi-annual reporting requirements found in Section F.5)**

A. 40 CFR 63.804, **COMPLIANCE CERTIFICATION** signed by a responsible official of the company that owns or operates the affected source to include:
(1) Statement that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
(2) Statement that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
(3) Statement of whether or not the affected source was in compliance, and if not, what measures were taken to bring the affected source in compliance.

B. These Conditions 1, 5, and 6 (Operating limitations, Recordkeeping, and Reporting) are intended to convey the requirements of 40 CFR Part 63, Subpart JJ, as applicable to the affected facilities permitted herein. This does not release the owner\operator of this source from responsibility for any requirements of Subpart JJ. not specifically stated in this permit.

**7.** **Specific Control Equipment Operating Conditions:** N.A.

**8.** **Alternate Operating Scenarios:** N.A.

## SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**14 (-)** Woodworking 1
Mill Department:
4 Panel Saws – Gabbiani
1 Laminator – Harlan
1 Vertical Panel Saw – Hendricks
2 Edgebanders – IDM
2 Dado Machines – Concept
1 Boring Machine – Morbidelli
1 Boring Machine – Vitap
2 Notch Saws – Pistorus
1 Dado Machine – Evans
2 Table Saws – Powermatic
1 Band Saw – Powermatic
1 Chop Saw - Milwaukee

Woodworking 2
Frame Department:
2 Drum sanders - Timesaver
1 Orbital sander - Timesaver
1 Sander - Fladder
2 Conveyor belt sanding lines
1 Chop Saw - Whirlwind
1 Edge Sander - Crouch
1 Tenoner - Powermatic
1 Shaper - SCMI
2 Mortisers
1 Table saw - Powermatic
1 Tub Drill - Unique

**Control System:** Carter Day baghouse with a Triboguard leak detection system:

**1. Operating Limitations:**
A. Particulate emissions shall be routed through the baghouse at all times when woodworking equipment is operated.
B. An audible alarm alerting personnel of excess particulate emissions shall be connected to the leak detection system on the baghouse.

**2. Emission Limitations:**
A. Visible emissions shall not equal or exceed 20 % opacity. (401 KAR 59:010, Sect. 3)
B. Particulate emissions shall not exceed 2.34 lbs/hr per booth (401 KAR 59:010, Sect.3)
**Compliance:** Compliance with the limits is assumed when the baghouse is functioning and in good working order.

**3. Testing Requirements:** Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Specific Monitoring Requirements:** The permittee shall monitor the baghouse output for excess particulate loading indicative of a damaged bag.

**5. Specific Recordkeeping Requirements:** The permittee shall record each instance of the alarm sounding indicating a malfunction in the baghouse. The record shall include the date, time and duration of each alarm, and the time corrective action was initiated and completed and a brief explanation of the cause of the alarm and the corrective action taken.

**6. Specific Reporting Requirements:**
A. The permittee shall submit a deviation report if the bag leak detection alarm sounds more than 5% of the operating time in any six month period.
B. If no deviation from emission limitations or operating requirements occurred astatement to that effect and a statement that no monitoring system used to determine compliance

## SECTION B - EMISSION POINTS, AFFECTED FACILITIES, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

with the emission limits was inoperative, inactive, malfunctioning or out of control. shall be included in the annual compliance certification required in Section F.5 and 6 of this permit.

**7. Specific Control Equipment Operating Conditions:**

A. The baghouse shall be maintained and operated in accordance with manufacturer's specifications and recommendations.

B. Any container receiving discharge from the baghouse collection hopper shall be enclosed in such a manner that fugitive emissions are not generated when the hopper is emptied.

## SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to Regulation 401 KAR 52:020, Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

| Description | Generally Applicable Regulation |
|---|---|
| 1. Raypac Boiler<br>3.0 mmBTU/hr Natural Gas | 401 KAR 59:015 |
| 2. Two Maxxon Curing Ovens<br>Each rated 2.4 mmBTU/hr Natural Gas | 401 KAR 59:015 |
| 3. Adhesive Application | None |

## SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. Sourcewide emissions of Volatile Organic Compounds (VOC's) shall not exceed 240 tons per rolling 12 month total.

2. VOC emissions, as measured by methods referenced in 401 KAR 50:015, Section 1, shall not exceed the respective limitations specified herein.

3. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

4. The permittee shall not allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. (401 KAR 63:020)

5. **Recordkeeping:**
   The permittee shall keep monthly records showing the amount of each VOC and/or HAP containing material used and a summary of the total amount of VOC and each individual HAP and total HAPs emitted during the month and for the rolling 12 month period.
   VOCs emitted from burning of natural gas shall be calculated as 5.5 lbs. per million cubic feet burned.

6. **Reporting:**
   The permittee shall submit a **semiannual** report to the Division's Ashland Regional Office which shows the total amount of each VOC and/or HAP containing material used at the source. The report shall contain a monthly summary of VOCs and of each HAP emitted from these materials, as well as a rolling 12 month total for each pollutant. Sample calculations shall be included. The monthly report may also coincide with semiannual reporting required in **Section F.5**, and the annual compliance certification required in **Section F.7**.

# SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

**Control Device #01:** Telkamp Thermal Oxidizer
Maximum rate capacity of the burner: 2.7 MMBtu/hr
The control device was installed in March 2003.

## 1. Operating Limitations:

A. The average combustion chamber temperature in any 3-hour period shall not fall below the combustion temperature limit established during the most recent performance test which demonstrated compliance.

B. The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature. This average combustion temperature is the minimum operating limit of the thermal oxidizer.

**Compliance Demonstration Method:**

Compliance shall be demonstrated by continuously recording temperature in the combustion chamber at a location in the combustion zone and calculating the 3-hr average operating temperature at 15-minute intervals.

C. The permittee shall install, calibrate, maintain and operate in accordance with manufacturer's specifications a temperature monitoring device in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs. The temperature monitoring device shall be equipped with a continuous recording device.

D. The temperature-monitoring device shall have an accuracy of the greater of 0.75 percent of temperature measure expressed in degrees Celsius or $\pm$ 2.5$^{o}$C.

E. To ensure compliance with Regulations 401 KAR 50:012, Section 1(2) and 401 KAR 50:055, Section 2(5), the permittee shall operate the thermal oxidizer at all times coating is being performed.

## 2. Testing Requirements:

A. The permittee shall conduct a performance test on the thermal oxidizer to determine the destruction efficiency for volatile organic compounds in the six month period previous to the expiration of this permit.

B. Pursuant to Section VII 2(1) of the policy manual of the Division for Air Quality as reference by 401 KAR 50:016, Section 1. (1), the permittee shall submit a compliance test protocol at least one month prior to the projected test date.

## SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS (CONTINUED)

C. Pursuant to 401 KAR 50:045, Section 5, the Division shall be notified of the actual test date at least ten (10) days prior to the test.

**3. Specific Monitoring Requirements:**

The permittee shall continuously monitor the combustion chamber temperature during coating operations.

**4. Specific Recordkeeping Requirements:**

A. The permittee shall maintain records of the following information for the thermal oxidizer:
   1. The design and/or manufacturer's specifications.
   2. The operational procedures and preventive maintenance records.
   3. The average combustion chamber temperature during the most recent performance test which demonstrated compliance.
   4. The combustion chamber temperature of the thermal oxidizer shall be recorded continuously.
   5. All 3-hour periods (during coating operations) during which the average combustion chamber temperature of the thermal oxidizer is more than 28°C (50°F) below the average combustion chamber temperature of the thermal oxidizer during the most recent performance test which demonstrated compliance. Each occurrence shall be considered a deviation from permit requirements. See Section F(6).
   6. During all periods of operation of the thermal oxidizer in which the 3-hour average combustion chamber temperature of the thermal oxidizer is more than 28°C (50°F) below the average combustion chamber temperature of the thermal oxidizer during the most recent performance test which demonstrated compliance, or other malfunction of the thermal oxidizer, a daily log of the following information shall be kept:
      a. Whether any air emissions were visible from the facilities associated with the thermal oxidizer.
      b. Whether visible emissions were normal for the process.
      c. The cause of the visible emissions.
      d. Corrective action(s) taken shall be recorded.
   7. If the three hour average continues to be 50?F or more below the temperature established during the most recent stack test (which demonstrated compliance) for more than three hours, the process shall be shut down until any problems are corrected.

B. All records shall be retained at the source for a period of five years.

**5. Specific Reporting Requirements:**

**Quarterly:** The permittee shall identify, record, and submit a written report to the Division's Ashland Regional Office of each instance in excess of 3 hours during which the average temperature of the thermal oxidizer remains more than 28°C (50°F) below that at which compliance was demonstrated during the most recent measurement of oxidizer efficiency. If no such periods occur during a particular quarter, the permittee shall state this in a semi-annual report required by General Condition F.6.

## SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b (IV)1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place as defined in this permit, and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b(IV) 2 and 1a(8) of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. In accordance with the requirements of 401 KAR 52:020 Section 3(1)h the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
   a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
   b. To access and copy any records required by the permit:
   c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

   Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Summary reports of any monitoring required by this permit, other than continuous emission or opacity monitors, shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Section 1b (V )1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

## SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020 Section 23. All deviations from permit requirements shall be clearly identified in the reports.

7. In accordance with the provisions of 401 KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
   a. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
   b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall submit written notice upon request.

8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7. above) to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by Section F.6 [Section 1b (V) 3, 4. of the Cabinet Provisions and Procedures for *Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

9. Pursuant to 401 KAR 52:020, Permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
   a. Identification of the term or condition;
   b. Compliance status of each term or condition of the permit;
   c. Whether compliance was continuous or intermittent;
   d. The method used for determining the compliance status for the source, currently and over the reporting period.
   e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

## SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

**Division for Air Quality**
**Ashland Regional Office**
**P.O. Box 1507**
**3700 13th Street**
**Ashland, KY 41105-1507**

**U.S. EPA Region IV**
**Air Enforcement Branch**
**Atlanta Federal Center**
**61 Forsyth St.**
**Atlanta, GA 30303-8960**

**Division for Air Quality**
**Central Files**
**803 Schenkel Lane**
**Frankfort, KY 40601**

10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KYEIS emission survey is mailed to the permittee.

11. Pursuant to Section VII (3) of the policy manual of the Division for Air Quality as referenced in 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days after the completion of the fieldwork.

## SECTION G - GENERAL PROVISIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020 and of the Clean Air Act and is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a, 3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020 Section 26].

2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a, 6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
   a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
   b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
   c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

   Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the conditions of this permit [Section 1a, 7,8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

## SECTION G - GENERAL PROVISIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a, 14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a, 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

8. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens of the United States [Section 1a, 15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a, 10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3)(b)].

11. This permit does not convey property rights or exclusive privileges [Section 1a, 9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.

13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3)(d)].

14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3)(a)].

15. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

16. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of issuance. Compliance with the conditions of a permit shall be considered compliance with:
    (a) Applicable requirements that are included and specifically identified in the permit and
    (b) Non-applicable requirements expressly identified in this permit.

(b) Permit Expiration and Reapplication Requirements

1. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].

2. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020 Section 8(2)].

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).

2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements
No construction authorized by this permit

## SECTION G - GENERAL PROVISIONS (CONTINUED)

1. Construction of any process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.

2. Within thirty (30) days following commencement of construction and within fifteen (15) days following start-up and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Regional Office listed on the front of this permit in writing, with a copy to the Division's Frankfort Central Office, notification of the following:
   a. The date when construction commenced.
   b. The date of start-up of the affected facilities listed in this permit.
   c. The date when the maximum production rate specified in the permit application was achieved.

3. Pursuant to 401 KAR 52:020, Section 3(2), unless construction is commenced within eighteen (18) months after the permit is issued, or begins but is discontinued for a period of eighteen (18) months or is not completed within a reasonable timeframe then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Upon written request, the Cabinet may extend these time periods if the source shows good cause.

4. For those affected facilities for which construction is authorized by this permit, a source shall be allowed to construct with the proposed permit. Operational or final permit approval is not granted by this permit until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055. If compliance is not demonstrated within the prescribed timeframe provided in 401 KAR 50:055, the source shall operate thereafter only for the purpose of demonstrating compliance, unless otherwise authorized by Section I of this permit or order of the Cabinet.

5. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration on the affected facilities in accordance with 401 KAR 50:055, General compliance requirements.
6. Terms and conditions in this permit established pursuant to the construction authority of 401 KAR 51:017 or 401 KAR 51:052 shall not expire.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

(e) Acid Rain Program Requirements

No Acid Rain Program Requirements authorized by this permit

(f) Emergency Provisions

1. Pursuant to 401 KAR 52:020 Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
   a. An emergency occurred and the permittee can identify the cause of the emergency;
   b. The permitted facility was at the time being properly operated;
   c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
   d. Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.01-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
   e. This requirement does not relieve the source of other local, state or federal notification requirements.

2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].

3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

   RMP Reporting Center
   P.O. Box 3346
   Merrifield, VA, 22116-3346

2. If requested, submit additional relevant information to the Division or the U.S. EPA.

(h) Ozone depleting substances

## SECTION G - GENERAL PROVISIONS (CONTINUED)

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
   a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
   b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
   c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
   d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166
   e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
   f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

## SECTION H - ALTERNATE OPERATING SCENARIOS

N.A.

## SECTION I - COMPLIANCE SCHEDULE

N.A.